

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF RHODE ISLAND**

In Re DAVID & KRISTEN IDEN

BK CHAPTER 7 No.: 13-12173

**A&P LANDSCAPING CO.
Plaintiff**

ADVERSARY No.: 13-

v.

**DAVID IDEN
Defendant/Debtor**

COMPLAINT OBJECTING TO DISCHARGE OF DEBT

1. The Defendant entered into a contract with the Plaintiff on March 28, 2013. The contract provided for landscaping services to be performed at Defendant's residence;

2. In connection with the above referenced contract for services, the Defendant made certain false and misleading statements to Plaintiff which caused Plaintiff to reasonably rely upon same to its detriment;

3. The above referenced debt was procured by fraud and therefore non dischargeable under 11 USC 523 §(a)(2)(A);

WHEREFORE Plaintiff prays that the Court declare the outstanding indebtedness due Plaintiff by Defendant non dischargeable under 11 USC 523 §(a)(2)(A) of the bankruptcy code.

November 27, 2013

A & P LANDSCAPING CO.

By its attorney,
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